

Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the KCIW Program



King County
Wastewater Treatment Division
Industrial Waste Program

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Mission Statement

The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.

Industrial Waste Advisory Committee

Kevin Burrell,
Environmental Coalition of South
Seattle (ECOSS)
Ken Gross, GM Nameplate
Sandy Hallberg, Asko Processing
Lou Hollers, North Creek Analytical
Donna Hoskins, Berlex Laboratories
Bill Hughes, Circuit Partners
Mike Jeffers, Envirotech Systems
Kim Niino, Safeway Distribution Center
Tom Raymond, Honeywell, Inc.
Steve Skodje, Cargill, Inc.
Doris Turner, Boeing Commercial
Airplane Group- Renton
Chris VanHoof, City of Kent

The King County Industrial Waste Program salutes the 2002 Award and Recognition Program Awardees

(awarded in 2003 and listed here throughout that year)

Commitment-to-Compliance Award

Boeing Commercial Airplane – Renton
Circuit Services WorldWide LLC
Industrial Container Services, Inc.
Time Oil Company
Universal Sheet Metal, Inc.

2002 Commitment-to-Compliance winner: Universal Sheet Metal



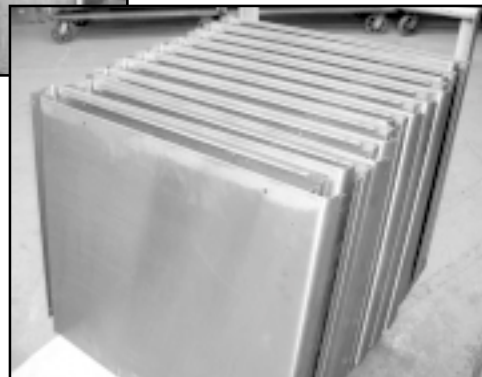
Universal operators Henry Truong and Mike Muir

Founded in 1982, the company makes manual sheet metal products for electronic and related industries. Clients are a broad range of Pacific Northwest and West Coast manufacturers. The company's metal finishing processes use phosphate and chromate; wet (solvent and water-based) paints; and aluminum and steel sheets. The company is proud of its ISO (International Organization for Standardization) certification.

The Commitment-to-Compliance Award honors companies that protected public health and the environment by discharging wastewater every month for five years with no violations of any kind. When asked how the company achieved this, President Richard Peterson commented,

Occasionally KCIW profiles a Rewards and Recognition Award winner.

Universal Sheet Metal, Inc., of Woodinville won one of the four 2002 Commitment-to-Compliance awards announced in spring 2003 by KCIW.



Inside This Issue:

Profile of Commitment-to-Compliance Winner:

Universal Sheet Metal, Inc.
KCIW News Briefs
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- Appeals
- June IWAC Meeting
- Genie Industries Wins Best Award
- Component Agencies Update:
 - Root-Killers
- Recent KCIW Enforcement Actions

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KCIW News Briefs

Nominations for EnviroVation awards

Nominations for your own business or another facility are due December 15. To learn about nomination criteria, visit: <http://dnr.metrokc.gov/wlr/indwaste/Awards.htm> on the Web, or contact Kristin Painter at 206-263-3000 or email kristin.painter@metrokc.gov.

Source control inspection process in the Lower Duwamish Waterway area

KCIW, Seattle Public Utilities, Local Hazardous Waste Management Program in King County and Public Health – Seattle & King County are working with local property owners to control sources of pollution that could make their way into the Lower Duwamish Waterway.

Inspectors are currently visiting businesses in the area. During an initial visit inspectors are asking a few questions to determine whether they need to schedule an inspection of the business's stormwater and wastewater discharges. If inspectors find that changes are needed in a business's pollution control practices, they will work with the company to identify improvements to reduce the pollution coming from the property.

By controlling these ongoing sources, we can work together to reduce the possibility of polluting the waterway after the planned cleanup.

For more information visit <http://dnr.metrokc.gov/wlr/indwaste/duwamish.htm> on the Web, or call KCIW at 206-263-3000 or TTY relay service at 1-800-833-6388.

KCIW Web pages at your service!

Remember that our program offers a variety of information and forms for you on our Web pages. Go to our main page <http://dnr.metrokc.gov/wlr/indwaste/index.htm> and use the left-hand side navigation bar to access topics.

Click on "Forms" to locate our program's *Industrial Waste Discharge Self-Monitoring Report*, *Wastewater Discharge Permit Application and Instructions*; and *Hazardous Waste Notification Form*.

Select "Fees and Surcharges" for information about Permit Fees, the Surcharge Program, and the Post-Violation Fee Schedule.

Fact sheets include the *Construction Dewatering Fact Sheet and Request Form* (click on "Construction Sites") and the *Discharges of contaminated industrial stormwater to the King County sanitary sewer system fact sheet* (click on "Contaminated Stormwater").

Let us know what else you would like to see on our Web site. Contact Dana West at dana.west@metrokc.gov or 206-263-3018.

Gold Award

Alaskan Copper Works – 6th Ave.
Amgen Corporation
B.S.B. Diversified Company
Baker Commodities, Inc.
Ball Metal Beverage Container Corp.
Boeing Commercial Airplane –
North Field
Boeing Commercial Airplane – Renton
Boeing Electronics Center
Boeing Integrated Defense Systems – Kent
Bunge Foods
Burlington Northern/
Santa Fe Railroad Company
Burlington Environmental – Kent
Carnitech US, Inc.
Circuit Partners, Inc.
Circuit Services WorldWide LLC
Circuits Engineering, Inc.
Coal Creek Development Corp. –
Landmarc Technologies
Color Tech
Crane-Eldec Corporation –
Martha Lake Facility
Crane-Eldec Corporation –
North Creek Facility
Davis Wire Corporation
Emerald Recycling
Foss Maritime Company
GM Nameplate, Inc.
Green Garden Food Products, Inc.
I-90 Express Finishing
Industrial Container Services, Inc.
Industrial Plating Corporation
Interstate Brands Corp. – Hostess
Kenworth Truck Company – Renton
King County Road Services Division –
Renton Decant Station
King County Solid Waste –
Cedar Hills Landfill
Magnetic and
Penetrant Services Company
Marine Vacuum Service
Mastercraft Metal Finishing, Inc.
Oberto Sausage Company – Airport Way
Pacific Iron & Metal
Pacific Metallurgical
Pepsi-Cola Company
Philip Environmental Services Corp.
Pioneer Human Services
Precor USA – Plant 1
Precor USA – Plant 2

Gold Award continued

Puget Sound Energy
Redhook Brewing Company
Rexam Beverage Can Company
Safeway, Inc. – Beverage Plant
Seattle Barrel Company
Seattle FilmWorks Manufacturing /
PhotoWorks, Inc.
Seattle Solid Waste – Kent
Highlands Landfill
Shasta Beverages
Skills, Inc. – Auburn Facility
Skills, Inc.
Smith Fabrication, Inc.
Stockpot, Inc.
Time Oil Company
Universal Brass, Inc.
Universal Sheet Metal, Inc.
Vectra Fitness
Vitamilk Dairy, Inc.
Western Pneumatic Tube
Western Processing Trust Fund II
Weyerhaeuser Company

Silver Award

A. O. Smith Water Products Company
Arco Petroleum Products Co. –
Seattle Terminal
Asko Processing
Cedar Grove Composting
Costco Wholesale
Electrofinishing, Inc.
Emerald Sanitary Services LLC
Flow International Corporation
Genie Industries – Bldg. 11 –
Canyon Park Plant
Genie Industries – Bldg. 3 & 4
Genie Industries – Bldg. 6 & 7 –
Scissors Plant
Glacier Northwest – Kenmore
Hytek Finishes
Northstar Beverage Company
Prototron Circuits, Inc.
Quality Finishing, Inc.
Siemens Medical Solutions USA –
Ultrasound Group
Surftech Finishes Company
Tri-Way Industries
Western Metal Arts

Industrial Pretreatment Tips

What it means to be a “New Source”

Q. *Why does a new business have to meet more stringent federal categorical standards than an existing business?*

A. Sometimes being “new” is not necessarily a good thing. This is certainly the case when it comes to federal categorical pretreatment regulations that businesses must meet.

Although you wouldn’t think the definition of “what is new” would be that important, it is so critical that in 1984 the Third Circuit of the United States Court of Appeals decided the final definition!

Why is this definition so significant? Because categorical standards issued by the EPA frequently have more stringent standards for new sources than they do for existing dischargers. A case in point is the cadmium limit applicable to electroplaters and metal finishers:

Dischargers subject to the electroplating standards for existing sources (40 CFR 413) have a daily maximum cadmium limit of 1.2 mg/l. The limit for new sources under the metal finishing standards is much lower - (40 CFR 433) is 0.11 mg/l!

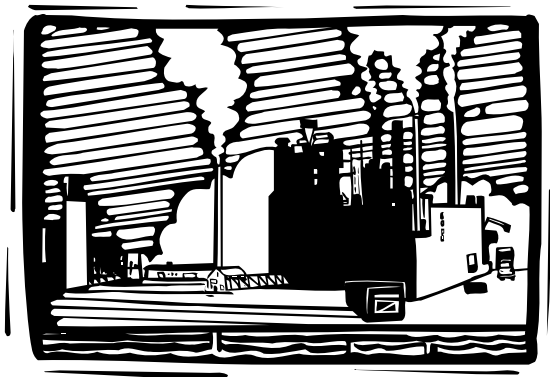
While the 1.189 mg/l difference doesn’t seem like much, it really is significant because the pretreatment system employed must be designed and operated to meet the more stringent standard. This translates into more dollars required for equipment and operation.

Now back to the definition of “new source.” The Third Circuit Court of Appeals classifies a new source as “any source commencing construction after the proposal of an applicable Pretreatment Standard for a New Source.” The standard for metal finishers and electroplaters was proposed on August 31, 1982. Thus, a facility constructed after this date must meet the new source standard.

Also classified as new sources are facilities that did not house a metal finishing operation at the time the rule was proposed, but were subsequently converted to that use.

The application of the new source rule may well create situations where existing facilities have a competitive advantage over new facilities that are opening nearby.

If you have any questions as to what discharge regulations may apply to a facility you are planning to establish you should contact the Industrial Waste representative that works with your company or call 206-263-3000.



Industrial Pretreatment Tips

Testing accuracy and violations

Q. Why can't a sample that is just "a bit" over the limit be allowed?

A. KCIW must follow the general pretreatment regulations established by the Environmental Protection Agency, which requires that a Notice of Violation be sent whenever a discharge value exceeds the limit.

If the violation is so small that it is within established accuracy, and the company has no other, or previous, violations, then KCIW would send a "no further action" letter. KCIW would not require a fine or compliance schedule.

Using cadmium as an example:
The metal finishing regulations for new sources (40 CFR Part 433) have a daily maximum limit for cadmium of 0.11 mg/l. This means that any concentration above 0.11 mg/l, no matter how small, is a violation. However no substantive action would be taken unless the concentration is above:

$$(0.11 \times 10\%) + 0.11 = 0.121 \text{ mg/l}$$

"Variability" is defined as the inherent error associated with analytical measurements or procedures. "Confidence limit" is the interval defined by the variability. The upper boundary is used as the defining limit of accuracy and precision for quantitative measurement. Anything below the confidence limit indicates uncertainty in the measure.

KCIW takes both variability and confidence limit into consideration when it reviews monitoring data, especially if the data indicates that a discharge violation has occurred. Almost all regulated parameters have variabilities established for them.

Parameter`	Variability
Cadmium	+ 10%
Chromium	+ 10%
Copper	+ 10%
Nonpolar FOG	+ 25%

If you have any questions about your limits and/or testing accuracy please contact the Industrial Waste investigator assigned to your facility or call 206-263-3000.

Industrial Pretreatment Tips

Requests for Reconsideration (Appeals)

Q. We wanted to appeal the Industrial Waste Program's official action and we were told it was too late. Why?

A. Section 28.84.100 of the King County Code contains the provisions that govern appeals from decisions of the director [of Department of Natural Resources of King County or a duly authorized designee] related to permits, discharge authorizations, violations, and penalties under Section 28.84.050 of the Code. These include actions issued by KCIW.

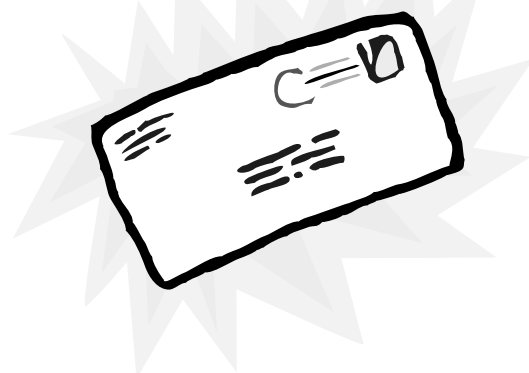
To ensure that fair and equitable treatment is provided to all industrial users subject to the code, KCIW strictly adheres to the appeal procedures specified. Paragraph A includes the following:

"Any person allegedly aggrieved by such decision of the director shall, prior to filing any appeal with King County hearing examiner, request that the director reconsider the decision. Such requests must be made within fifteen calendar days of the date of such decision."

Procedures include the following:

- All decisions issued by KCIW are sent via certified mail with a return notice requested and with the appeal procedures attached, to ensure that we are complying with the timeline.
- Upon receipt of the green card from the Post Office, KCIW records the date the company received the letter.
- Any appeal KCIW receives following expiration of the fifteen calendar day period is invalid and cannot be considered.

If you have any questions concerning a decision by KCIW, or the appeals procedures, you should contact Industrial Waste contact noted in your letter, or call 206-263-3000.



Summary of June Industrial Waste Program Advisory Committee (IWAC) Meeting



IWAC board members, June 2003: l. to r., front row: Mike Jeffers, Envirotech Systems; Ken Gross, GM Nameplate; Donna Hoskins, Berlex Laboratories; Doris Turner, Boeing Commercial Airplane Group-Renton; Kim Niino, Safeway Distribution. Back row: Mike Perkins, North Creek Analytical (representing Lou Hollers); Bill Hughes, Circuit Partners; Sandy Hallberg, Asko Processing; Kevin Burrell, ECOSS; Chris VanHoof, City of Kent. (Absent: Steve Skodje, Cargill, Inc.)

Introductions/Photographs of IWAC

Members: Introduction of new IWAC members Kevin Burrell of the Environmental Coalition of South Seattle (ECOSS), Kim Niino of Safeway Inc., and Mike Perkins who sat in for Lou Hollers of North Creek Analytical, Inc.

Ned Ahrens, King County photographer, took an annual portrait of the IWAC board.

Announcements: KCIW congratulated those companies with staff serving as IWAC board members, which won King County and Industrial Waste Program (KCIW) Awards for 2002:

- Asko Processing - Silver Award, IWAC board member by Sandy Hallberg.
- The Boeing Company— Green Globe Award, Commitment-to-Compliance Award, and two Gold Awards, IWAC board member Doris Turner.
- Circuit Partners – Gold Award, IWAC board member Bill Hughes.
- GM Nameplate – Gold Award, IWAC board member, Ken Gross.

Washington State Department of Ecology's (Ecology) Industrial Stormwater Permit

Discussion: Mel Oleson from Boeing Regulatory Group gave a presentation concerning the difficulties and challenges, from a business perspective, associated with the new Ecology *Industrial Stormwater Permit*. Discussion on the topic continued from previous meetings.

Green/Duwamish River and Central Puget Sound Watershed (WRIA 9) Salmon Habitat

Planning: Dennis Clark, Green/Duwamish (WRIA 9) Public Outreach Coordinator, gave a presentation on salmon habitat planning efforts in the Green/Duwamish River and Central Puget Sound Watershed, known as Water Resource Inventory Area (WRIA) 9.

In 1999, chinook salmon and bull trout were listed as threatened under the Endangered Species Act (ESA). This federal law protects not only the species itself, but also the habitat the species needs to survive and prosper. The numbers of salmon in our region have declined dramatically over the last 100 years. Scientists agree that the cause of their decline is multi-fold. High rates of fishing, the overuse of hatcheries to compensate for diminished numbers, hydropower dams, and degraded and lost habitat, have all significantly contributed to the decline of the species.

Elected officials and citizens formed a WRIA 9 Steering Committee to respond to salmon listings under the Endangered Species Act. The Steering Committee is charged with using scientific information to develop plans that protect and restore salmon habitat in WRIA 9. The latest product of the Steering Committee is the Near-Term Action Agenda for WRIA 9, which was approved by the Steering Committee in March 2002. The Near-Term Action Agenda for watershed salmon habitat protection and restoration is available for downloading at <http://dnr.metrokc.gov/Wrias/9/NTAA/index.htm> on the Internet. Local governments, non-profit groups, and volunteers were active in 2002 in protecting and restoring salmon habitat. Some used the Near-Term Action Agenda to inform and obtain funding for their activities.

The overall planning effort is directed by all 16 of the local governments that share the watershed. Under an interlocal agreement, the parties provide financial support to pay for the planning effort. These governments include:

City of Algona; City of Auburn; City of Black Diamond; City of Burien; City of Covington; City of Des Moines; City of Enumclaw; City of Federal Way; City of Kent; King County; City of Maple Valley; City of Normandy Park; City of Renton; City of SeaTac; City of Seattle; and City of Tukwila. In addition, the City of Tacoma is a partner in the planning process because of its municipal water diversion on the Green River.

Five staff, provided under contract by King County, are helping in this planning effort. This WRIA

9 Watershed Coordination Services team is supporting the work of the Steering Committee and its Work Groups, developing plans, and working to inform and educate the public about local salmon habitat planning and current protection and restoration work. For more information, visit the Web site <http://dnr.metrokc.gov/Wrias/index.htm> or contact Dennis Clark at 206-296-1909 or e-mail dennis.clark@metrokc.gov.

Update on the KCIW Dental Project: KCIW informed the group that the deadline for all dental practices in the King County service area to be in compliance with King County limits was July 1, 2003. Beginning July 2003, KCIW investigators were to begin inspecting dental offices to see that they meet

King County limits. All new dental practices must be in compliance when they open. Those seeking more information concerning the Dental Project can visit <http://dnr.metrokc.gov/wlr/indwaste/dentists.htm> on the Internet, or contact Patricia Magnuson at 206-263-3021 or e-mail patricia.magnuson@metrokc.gov.

Upcoming meetings: The next meeting was planned for September 10, 9 a.m., at 130 Nickerson Street, Suite 105, Seattle, WA 98109, with the agenda to be determined. A meeting is also scheduled for December 3.

(Universal Sheet Metal continued from page 1)

"The operators have worked together to supply consistent maintenance and operation of the line."

Operators Mike Muir and Henry Truong added basic, effective solutions to quality control: "Being willing to take the time is important. We keep on top of things before they become a problem." Also important are using and maintaining quality chemicals. Taking plenty of time for dragout keeps up the quality of chemicals used and minimizes the pollutants in the rinsewaters discharged.

What are the company's goals for the next five years? "We plan to install new rinse systems that will allow us to reduce incoming water usage by a minimum of 30% through improved processes," said Peterson.

KCIW congratulates Universal Sheet Metal on its excellent record of compliance!

Genie Industries is 2003 BEST Award Winner

Genie Industries is a recipient of the KCIW's 2002 Silver Award

The Business and Industry Resource Venture and its program partners honored Genie Industries among the 11 BEST Award-winning businesses in May 2003. The BEST (Businesses for an Environmentally Sustainable Tomorrow) Awards celebrate notable "green" achievements by companies in the Greater Seattle area.

Genie Industries, which produces material lifts and a series of aerial work platforms at its Redmond facility, won the group's 2003 Water Conservation Award. At Genie Industries, most water is consumed in the preparation of metal surfaces for painting. Genie's conservation initiatives have focused on recycling, counter-flow rinsing and process control.

In one example, before Genie's water conservation upgrades, several facilities used a five-stage spray wash system, which required clean, incoming water that was discharged directly to the sewer system after use. In an improvement, Genie configured all of the rinse stages in a specific building in a counter-flow arrangement. The final rinse stage was then the only tank to receive fresh water.

In 2000, after the implementation of several water conservation practices and facility consolidations, the average daily water use at Genie decreased by 63%.

A partnership of the Greater Seattle Chamber of Commerce and Seattle Public Utilities, the Business and Industry Resource Venture provides free information, assistance and referrals to help Seattle businesses improve their environmental performance. To learn more about the organization and the awards, go to:

<http://www.resourceventure.org> on the internet.

Component Agencies Update: Root-Killers

Background

As local sewer agencies know, root-intrusion is a common problem in sanitary sewer pipes. One effective method for controlling root-growth is to use root-killing chemicals. At this time, only root-killing products containing the active ingredient Dichlobenil are approved for use in the King County sanitary sewer system. This chemical has been used by local sewer utilities for the past several years and the Industrial Waste Program has established a limit of three (3) pounds of Dichlobenil per day for either the South or West Point treatment plants of King County. This capacity is allocated to local sewer agencies on a first-come, first-served basis. Local sewer agencies can call the Industrial Waste Program engineer, Bruce Tiffany (T: 206-263-3011) in order to have a discharge approved.

Seattle Public Utilities' Discharge Authorization

As part of an on-going program to control root-growth, Seattle Public Utilities (SPU) is implementing a program that utilizes more frequent use of the the root-killing chemical, Dichlobenil. Because of the on-going nature of this discharge, the Industrial Waste Program issued SPU a discharge authorization. SPU was allocated one (1) pound of Dichlobenil per day for parts of their service area that are tributary to the West Point treatment plant of King County. This accounts for one-third (1/3) of the three (3) pound allocated industrial capacity of the West Point treatment plant. The discharge authorization also includes special conditions for monitoring these discharges.

Publication of recent enforcement actions

This publication reports companies that were the subject of enforcement actions during the period of June through August 2003 (or that have not been published previously) and their violations met one or more of the following criteria:

- Were found in significant noncompliance during the reporting period;
- Received fines; or
- Had violations that were unique or warrant special attention.

Companies Found with Significant Noncompliance

Company	Nature of Violation/ Type of Pollutant	Basis for Significant Noncompliance	Penalty	Comments
I-90 Express Finishing 15046 NE 95 th St. Redmond, WA 98052	Late Report	I-90 Express Finishing failed to file the application for renewal of their discharge permit within 30-days of the due date.	Notice of Significant Non-compliance	I-90 Express Finishing filed their application, no further action was taken.

In addition to the above actions, King County Industrial Waste also issued enforcement actions for the following: cadmium (1); cyanide amendable to chlorination (1).



This information is available on advance request in accessible formats for persons with disabilities. Please call 206-263-3000 or TTY relay service at 1-800-833-6388.

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